

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED] ORDER
TO AMEND CASE SCHEDULE**

This Document Relates to:

ALL ACTIONS

WHEREAS, on December 6, 2023, the Court entered Pretrial Order No. 4, which, in relevant part, ordered the parties to file certain pretrial proposals by December 14, 2023, ordered the parties to jointly file a proposed conference agenda by January 8, 2024, and scheduled a case management conference for January 12, 2024; and

WHEREAS, several lead counsel for Plaintiffs and Defendants have immovable conflicts on January 12, 2024; and

WHEREAS, the parties have been meeting and conferring regarding the materials required for submission by Pretrial Order No. 4 and require a short extension of the deadline in order to narrow disputes; and

WHEREAS, the parties agree that the most efficient format for the proposed protective

order required by Pretrial Order No. 4 is a single order, accompanied by a joint letter brief not to exceed five pages that briefly explains the few issues which may remain in dispute; and

WHEREAS, the parties are conferring over the most useful and appropriate format for the other proposed orders required by Pretrial Order No. 4 and may stipulate to an alternative format (not to exceed the total page limits stated in Pretrial Order No. 4); and

WHEREAS, on December 13, 2023, the Courtroom Deputy indicated that the Court would approve the stipulation and proposed order to continue the case management conference and extend the time to file the materials required by Pretrial Order No. 4.

THEREFORE, the parties respectfully request the Court enter the parties' stipulation to:

- Reschedule the initial case management conference to January 19, 2024;
- Extend the deadline to file the materials required by Pretrial Order No. 4 to December 21, 2023;
- Extend the deadline to file the proposed conference agenda to January 15, 2023;
- Allow the parties to jointly submit a single proposed protective order, along with a letter brief not to exceed five pages, which notes and explains any disputed issues; and
- Allow the parties to confer over the most useful and appropriate format for the other proposed orders required by Pretrial Order No. 4 and to stipulate to an alternative format (not to exceed the total page limits stated in Pretrial Order No. 4).

Dated: December 14, 2023

Respectfully submitted,

By: /s/ Sarah R. London

Sarah R. London (SBN 267083)

**LIEFF CABRASER HEIMANN &
BERNSTEIN**

275 Battery Street, Fl. 29

San Francisco, CA 94111

Telephone: (415) 956-1000

slondon@lchb.com